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OCT 27 1982

Mr. Rod Vlieger  
Chief, Land Operation Section  
Department of Environmental Quality  
Henry A. Wallace Building  
900 East Grand  
Des Moines, Iowa 50319

EPA I.D. NO.: IAD073489288

FACILITY LOCATION: UOP Inc.  
Northeast County Road  
Postville, Iowa 52162

Dear Rod:

We have reviewed the closure plan for the facility noted above and have the following comments:

1. We suggest that Norplex provide an addendum to their existing closure plan to address the deficiencies noted so their plan is approvable.

a. Closure Plan, 265.112(a). They should clarify for their addendum the terminology regarding use of the word "facility," i.e., they have used it to refer to their entire plant. They need to explain that their closure plan is just for the hazardous waste management portion of the facility.

1. The information on how the overall facility will be closed is provided; however, specific guidance on how and when the drum storage facility will be closed is not provided.

2. The maximum inventory is provided and adequate; specific wastes type quantities were not noted and would be beneficial under a full scale closure. However, I do not think those details are necessary for this "closure" process.

3. Information on the expected year and schedule for closure was not provided; they need to address this for the drum storage area.

b. Disposal or Decontamination of Equipment, 265.114. The information provided is adequate, except for omitting discussion on residue clean-up associated with spills, etc. on the base of the drum storage area.

c. Certification of Closure, 265.15. This item was not addressed; they need to provide information indicating that both their firm and an independent engineer will certify closure will be carried out in accordance with the final approved plan.

ARWM/WMBR-PMTS:DDegner:lmh:x6531:10-25-82:Disk B17

PMTS  
D.Degner  
10/25/82

PMTS  
Harrington  
10/26/82

WMBR  
Morby  
10/26/82



R00330138  
RCRA RECORDS CENTER

To help them address their deficiencies, you may want to provide them with copies of your agency's pertinent regulations on closure.

If you have any questions on this letter, please contact Dennis Degner at (816) 374-6531.

Sincerely yours,

Lyndell L. Harrington, P.E.  
Chief, Permits Section  
Waste Management Branch  
Air and Waste Management Division

bcc: Jack Coakley, SPRS  
Don Sandifer, AWCM



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
324 EAST ELEVENTH STREET  
KANSAS CITY, MISSOURI - 64106

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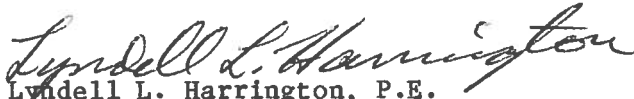
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OCT 29 8 31 AM '82  
U.S. DEPT.  
OF AGRICULTURE  
ENVIRONMENTAL QUALITY

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Sincerely yours,

A handwritten signature in cursive script, reading "Lyndell L. Harrington".

Lyndell L. Harrington, P.E.  
Chief, Permits Section  
Waste Management Branch  
Air and Waste Management Division